UNITED STATES DISTRICT COURT NORTHERN DISTRICT OF ILLINOIS EASTERN DIVISION

ABC Corporation I et al,

Plaintiff,

v.
THE PARTNERSHIPS and
UNINCORPORATED ASSOCIATIONS
IDENTIFIED ON SCHEDULE "A",

Defendant.

CASE NO. 1:20-cv-04806

Judge: Honorable Thomas M. Durkin

DEFENDANTS' MOTION FOR LEAVE TO FILE UNDER SEAL

Defendants Fengchi-US, Gaodeshang-US, Gyroor, Gyroor-US, Gyroshoes, HGSM, Jiangyou-US, Urbanmax file this Motion requesting leave to file the following documents under seal: 1) Statement of Sales and Accounting [Dkt. No. 466]; and 2) Tianyu Ju's Declaration in Support of Statements of Sales and Accounting and Exhibits [Dkt. No. 467].

In addition, sealing statement of sales and accounting of Amazon deduction are necessary as in order to provide these statements, Defendants would have to provide data and information contained highly confidential information, which would jeopardize Defendants' business if these were revealed.

Therefore, Defendants request the Court grant Defendants leave to file the Statement of Sales and Accounting and related documents under seal.

Date: 10/22/2021 /s/ Tianyu Ju

Tianyu Ju, Esq.
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Chicago, IL 60601
Attorney for Defendants

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that on this October 22, 2021, I electronically filed the foregoing file with the Clerk of Court using the CM/ECF system, and service was perfected on all counsel of record and interested parties through this system, which will deliver a true and correct copy of the foregoing documents via CM/ECF.

Date: 10/22/2021	/s/ Tianyu Ju
	Tianyu Ju, Esq.